



Department of Energy
Carlsbad Field Office
P. O. Box 3090
Carlsbad, New Mexico 88221

APR 13 2018

Mr. John E. Kieling, Chief
Hazardous Waste Bureau
New Mexico Environment Department
2905 Rodeo Park Drive East, Building 1
Santa Fe, NM 87505-6303

Subject: Request for a 90-Day Extension of Time for Implementation of the Approved Class 2 Permit Modification Requests, "Training Program Revision" and "Changes Due to Construction and Operation of a New Filter Building" at the Waste Isolation Pilot Plant Hazardous Waste Facility Permit Number NM4890139088-TSDF

Reference: New Mexico Environment Department correspondence from Butch Tongate, Secretary, New Mexico Environment Department to Todd Shrader, CBFO, and Bruce C. Covert, NWP, dated March 23, 2018, subject: Final Determination, Class 2 Permit Modification Decision Waste Isolation Pilot Plant, EPA I.D. Number NM4890139088

Dear Mr. Kieling:

The purpose of this letter is to request an extension of time for implementation of the referenced 2-item Class 2 Permit Modification Request (PMR), *Training Program Revision and Changes Due to Construction and Operation of a New Filter Building*. The New Mexico Environment Department (NMED) made a final determination regarding this PMR on March 23, 2018. The effective date for this permit modification is April 23, 2018. The complete searchable copy of the permit, as modified, will be posted onto the Information Repository on April 23, 2018 pursuant to Permit Part 1, Section 1.14.

Due to the extensive nature of the changes to the Facility Personnel Permit Training Program, the effort required to transfer detailed information from the Permit to the WIPP facility files, procedure changes needed to implement revised Permit Attachment O, and the fact that the requirements in the previous version of the Permit were generally more stringent than the approved revised permit, the Permittees are requesting that the NMED allow for a period of 90 days beyond the effective date of the revised permit for implementation of the approved changes. During this 90-day period, the Permittees will undertake efforts to establish the required WIPP facility files, make necessary procedural changes, and administer the new training courses that are outlined in the revised permit. These efforts will be completed no later than July 22, 2018 (i.e., within 90 days of the effective date of the approved Class 2 PMR). This request is being made per the requirements of Permit Part 1, Section 1.10.3., *Extension of Time*. Your timely response to this letter is appreciated.

Mr. Kieling

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We certify under penalty of law that this document and all attachments were prepared under our direction or supervision according to a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on our inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of our knowledge and belief, true, accurate, and complete. We are aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions, please contact Mr. Michael R. Brown at (575) 234-7476.

Sincerely,

Signatures on File

*Deputy Mgr
For T. Shrader*

Todd Shrader, Manager
Carlsbad Field Office

Bruce C. Covert, Project Manager
Nuclear Waste Partnership LLC

cc:

R. Maestas, NMED *ED

D. Biswell, NMED ED

H. Tellez, NMED ED

M. McLean, NMED ED

CBFO M&RC

*ED denotes electronic distribution